



July 9, 2015

Via ECF and Electronic Mail

The Honorable Analisa Torres
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street, Courtroom 15D
New York, NY 10007-1312

RE: Scheduling
Elijah v. Gotham Gastroenterology, PLLC and Eric Morgenstern, M.D.
Case No.: 1:15-cv-03514-AT
Our File No.: 11880.0197

Dear Judge Torres:

We represent defendants Gotham Gastroenterology, PLLC and Eric Morgenstern, M.D. (the “Defendants”) in this matter. Defendants have requested and Plaintiff has consented to a brief 14-day extension of Defendants’ time to answer or otherwise move in response to the complaint. Defendants’ response is currently due on July 10, 2015.

In accordance with Your Honor’s Individual Practices Rules, section 1.D, on behalf of Defendants, we respectfully request that the Court treat this correspondence as a letter motion to extend Defendants’ time to answer or otherwise move in response to the complaint through July 24, 2015. Defendants previously requested and were granted one extension of time to answer. This extension is being requested because the parties have entered into discussions to potentially amicably resolve this matter. Plaintiff’s counsel has consented to this request for an extension.

For the foregoing reasons, we respectfully request that the time within which Defendants must answer or otherwise move in response to the complaint be extended from July 10, 2015 to July 24, 2015. If Your Honor finds this request satisfactory, we respectfully request that the Court endorse this letter request as “So Ordered” and/or enter a text order granting this extension.

GONZALEZ SAGGIO & HARLAN LLP
Attorneys at Law

www.gshllp.com

Affiliated with Gonzalez, Saggio and Harlan, L.L.C.

New York
292 Madison Avenue
Floor 19
New York, NY 10017
Tel (212) 380-9560
Fax (212) 380-9561

Atlanta, GA
Boca Raton, FL
Boston, MA
Chicago, IL
Cleveland, OH

Indianapolis, IN
Los Angeles, CA
Miami, FL
Milwaukee, WI
Nashville, TN

Pasadena, CA
Phoenix, AZ
Washington, D.C.
Wayne, NJ
West Des Moines, IA

Respectfully submitted,

GONZALEZ SAGGIO & HARLAN LLP

By:



Steven Gerber

SG/MT/mr/sc

cc: Ronnie Silverberg, Esq. (via ECF)